

# **Exhibit 14**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,  
individually and on behalf of a class of all others  
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**STIPULATION OF FACT REGARDING CITY TRAFFIC DATA AND RECORDS**

WHEREAS, Plaintiffs' Fifth Amended Notice of Rule 30(b)(6) Deposition of Defendant City of Buffalo requested testimony regarding the topic of "City data and records concerning the issuance of traffic tickets and the disposition, amounts paid and amounts still owed on such tickets";

WHEREAS, Plaintiffs and Defendants have agreed to resolve Plaintiffs' request for testimony regarding this topic by entering into this stipulation of fact;

Plaintiffs and Defendants hereby stipulate and agree as follows:

1. The City of Buffalo maintains records and data for: (i) substantially all traffic tickets issued by the Buffalo Police Department, including records and data indicating the identity of the motorist who received the traffic ticket, the disposition of the traffic ticket, the amounts paid on the traffic ticket (if any), and the amounts still owed on the traffic ticket; and (ii) substantially all tows and impounds by the City of Buffalo, including the license plate number of the vehicle, the date of the impound, the duration of the impound, whether the vehicle was released, sold or auctioned, the amount

assessed for towing or storage fees, the amount paid from any source, and the amounts owed (the “City Traffic Records”);

2. The City of Buffalo will continue to maintain the City Traffic Records as long as this Action (including any appeal) remains pending;
3. In the event Plaintiffs believe that the City Traffic Records are necessary to prosecute their claims (for example, and without limitation, to identify class members or to calculate damages), Plaintiffs may request production of all or a relevant portion of the City Traffic Records. Defendants agree not to object to such a request on the basis that the request is made after the close of fact discovery. The parties agree to meet and confer in good faith regarding the scope and/or format of any production of the City Traffic Records following such a request, and either party may bring a dispute about the scope and/or format of such production to the Court for resolution.

Dated: March 20, 2024

Respectfully Submitted,

/s/ Cheyenne Freely  
Hugh M. Russ III  
Peter A. Sahasrabudhe  
Cheyenne Freely  
HODGSON RUSS LLP  
The Guaranty Building  
140 Pearl Street – Suite 100  
Buffalo, New York 14202  
Telephone: (716) 856-4000  
[hruss@hodgsonruss.com](mailto:hruss@hodgsonruss.com)  
[pshasra@hodgsonruss.com](mailto:pshasra@hodgsonruss.com)  
[cfreely@hodgsonruss.com](mailto:cfreely@hodgsonruss.com)

*Attorneys for Defendants*

/s/ Jordan S. Joachim  
Claudia Wilner  
Edward Krugman  
Anjana Malhotra  
NATIONAL CENTER FOR LAW  
AND ECONOMIC JUSTICE  
275 Seventh Avenue, Suite 1506  
New York, NY 10001  
212-633-6967  
[wilner@nclej.org](mailto:wilner@nclej.org)  
[krugman@nclej.org](mailto:krugman@nclej.org)  
[malhotra@nclej.org](mailto:malhotra@nclej.org)

Matt Parham  
WESTERN NEW YORK LAW  
CENTER  
Cathedral Park Tower  
37 Franklin Street, Suite 210  
Buffalo, NY 14202  
716-828-8415  
[mparham@wnylc.com](mailto:mparham@wnylc.com)

Chinyere Ezie  
CENTER FOR CONSTITUTIONAL  
RIGHTS  
666 Broadway, 7<sup>th</sup> Floor  
New York, NY 10012  
212-614-6475  
[cezie@ccrjustice.org](mailto:cezie@ccrjustice.org)

Jordan Joachim (*pro hac vice*)  
Christine Nelson (*pro hac vice*)  
COVINGTON & BURLING LLP  
620 Eighth Avenue  
New York, NY 10018  
212-841-1000  
[jjoachim@cov.com](mailto:jjoachim@cov.com)  
[cnelson@cov.com](mailto:cnelson@cov.com)

*Attorneys for Plaintiffs*